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March 5, 2003

Honorable James H. Welsh
Commissioner of Conservation
Office of Conservation
P. O. Box 94275
Baton Rouge, Louisiana 70804-9275

RE: Proposed Substitute Unit Well at an Exceptional Location
13 Sand, Reservoir A-B, SUA
GRAND BAY FIELD
Plaquemines Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Pioneer Natural Resources USA, Inc. for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the 13 RA-B SUA, in the Grand Bay Field, Plaquemines Parish, Louisiana, for which a unit was established and rules and regulations adopted by Office of Conservation Order No. 80-L-2, effective February 19, 1963.

1. To designate the Pioneer Natural Resources USA, Inc. - GPLD No. A-16 Well (S.N. 025583) located in Section 5, Township 20 South, Range 19 East, in the Grand Bay Field, Plaquemines Parish, Louisiana, as a substitute unit well at an exceptional location.

2. To continue in full force and effect the provisions of Office of Conservation Order No. 80-L-2 and the existing unit created thereby, except as herein specified.

3. To consider such other matters as may be pertinent to this application.

The present unit well, the Pioneer Natural Resources USA, Inc. - S.L. 195 QQ No. 86 Well (S.N. 080651) ceased to produce from the 13 Sand in July, 1986. The designation of a substitute unit well is therefore necessary and in the interest of conservation to efficiently and economically drain a portion of the 13 RA-B SUA which cannot be efficiently and economically drained by any existing well within such unit.

The 13 Sand, Reservoir A-B, in the Grand Bay Field, Plaquemines Parish, Louisiana was fully defined in Office of Conservation Order No. 80-L-2, effective February 19, 1963.

There is attached hereto and made a part hereof a plat identifying the subject unit created by Conservation Order No. 80-L-2, along with the location of the proposed substitute unit well. Pursuant to the Revised Rules of Procedure, a list of names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom this application is being sent is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list will be provided to any party requesting a copy. A diligent effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties as required by the Revised Rules of Procedure.

Finally, there is enclosed our check on behalf of the applicant, Pioneer Natural Resources USA, Inc., in the sum of \$755.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES



Bill McAlister

BM/cu
Enclosures

cc: Mr. Richard Hudson
Office of Conservation
825 Kaliste Saloom Road
Brandywine III, Suite 220
Lafayette, Louisiana 70508-4284

Interested Parties, Interested
Owners and Represented Parties

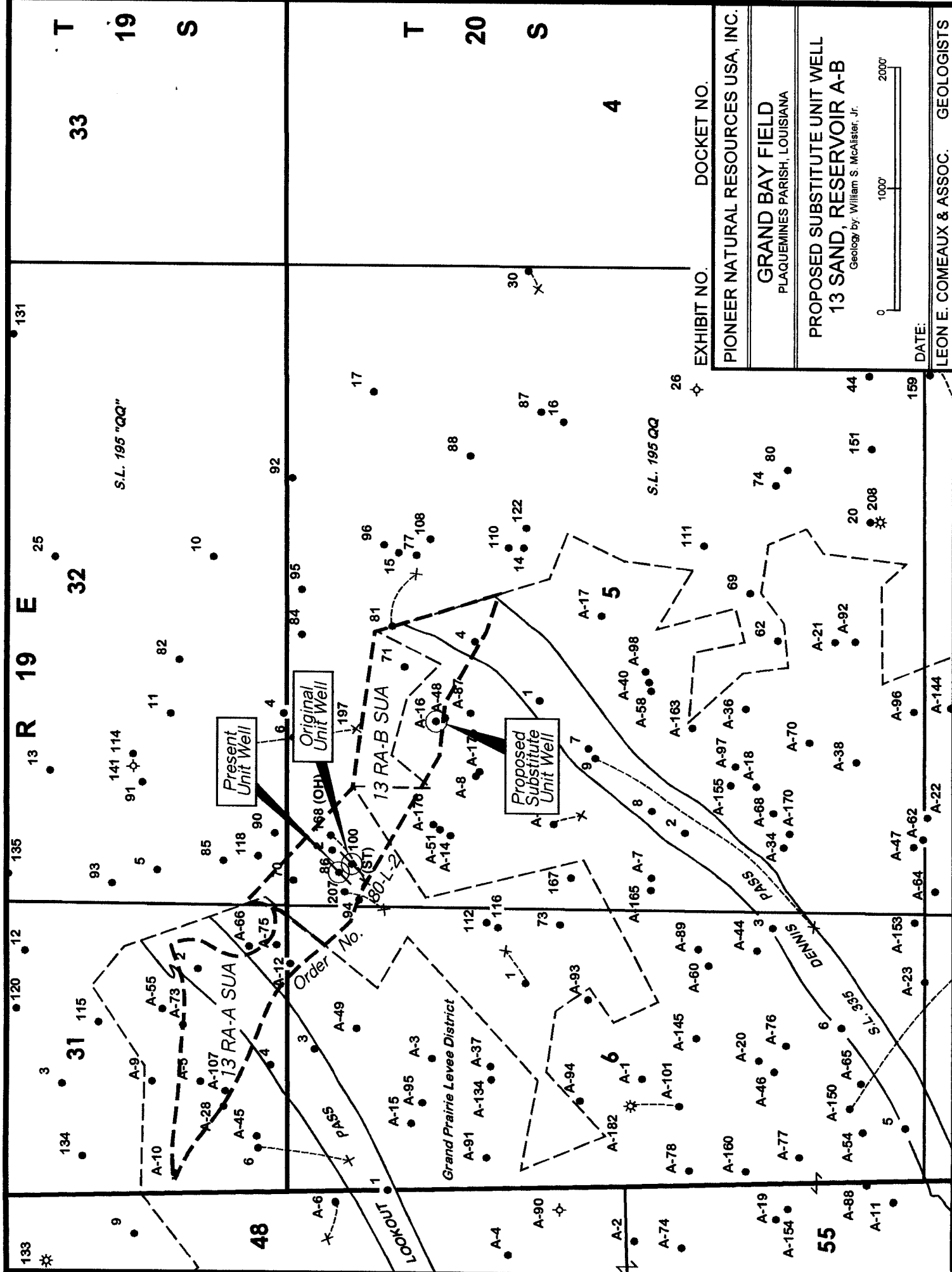
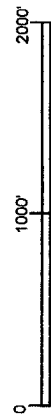


EXHIBIT NO. DOCKET NO.

PIONEER NATURAL RESOURCES USA, INC.

GRAND BAY FIELD
PLAQUEMINES PARISH, LOUISIANA

PROPOSED SUBSTITUTE UNIT WELL
13 SAND, RESERVOIR A-B
Geology by: William S. McAlister, Jr.



DATE:

LEON E. COMEAUX & ASSOC. GEOLOGISTS